

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

VIRGINIA ELIZONDO,

*Plaintiff,*

v.

SPRING BRANCH INDEPENDENT  
SCHOOL DISTRICT, *et al.*,

*Defendants.*

§ Civil Action No. 4:21-CV-01997

§

§ **SIM LAKE**

§ Judge

§

§ S. Anderson

§ Case Manager

\_\_\_\_\_  
Court Reporter

§

§

§ \_\_\_\_\_  
Proceeding

**AMENDED EXHIBIT LIST OF VIRGINIA ELIZONDO**

Exh No.	Date	Description	Bate/Depo. Exhibit No.	Offered / Admitted	Date	Object	Date Admitted
<a href="#">1</a>	01/20/22	Expert Report of Robert M. Stein, Ph.D.	Stein 1				
<a href="#">2</a>	03/28/22	Supplement to Expert Report of Robert M. Stein, Ph.D., March 28, 2022					
<a href="#">3</a>	10/10/22	Supplement to Expert Report Re: 2022 SBISD Trustee Elections of Robert M. Stein, Ph.D., October 10, 2022					
<a href="#">4</a>	08/21/23	Supplement to Expert Report Re: 2023 SBISD Trustee Elections of Robert M. Stein, Ph.D., August 21, 2023					
<a href="#">5</a>	01/20/22	Expert Report of Andres Tijerina, Ph.D.	Tijerina 1				
<a href="#">6</a>		SBISD Our District, Our Students, Demographics	SBISD 2				
<a href="#">7</a>		2010 – 2021 List/Names of All Candidates	SBISD 3				
<a href="#">8</a>		Map of Memorial Villages	SBISD 4				
<a href="#">9</a>		SBISD Election Precincts/Middle School Enrollment Zones	SBISD 5 SBISD000001				
<a href="#">10</a>		SBISD High School Enrollment Zones	SBISD 6				
<a href="#">11</a>		SBISD Elementary School Enrollment Zones	SBISD 7				
<a href="#">12</a>	05/01/21	SBISD Notice of School Trustee Election	SBISD 8				
<a href="#">13</a>		SBISD Fall Eco Dis Percent in Membership for 2021 for Spring Branch ISD for All Campuses for All Grades	SBISD 10 SBISD000405				

<a href="#">14</a>	04/05/19	email from R. Rodney to SBISD Board Members and administrators re: Charts you can appreciate, with attachments: "Racial Disparity in Harris County Independent School District," Texas Southern Center for Justice Research and "A Call for Restorative Education Initiatives in the Administration of Discipline in Spring Branch ISD – Report on Discipline and the Disciplinary Alternative Education Program in the Spring Branch ISD," The Coalition of Advocates for Restorative Education	SBISD 11				
<a href="#">15</a>		SBISD Staff – Fall/Summer by Campus by Ethnicity Race Report Category	SBISD 12 SBISD000799-806				
<a href="#">16</a>		SBISD Police Department Position/EEOC Race/Fiscal Year	SBISD 13 SBISD000807-816				
<a href="#">17</a>		SBISD Voter Registration Information by High School	SBISD 14 SBISD000874-875				
<a href="#">18</a>		Robert M. Stein Curriculum Vitae	pp. 8-23 of Stein Report				
<a href="#">19</a>		Figure 1, The proportion of vote cast for white candidate and Share of vote White	p.5 of Stein Report				
<a href="#">20</a>		Figure 2, The proportion of vote cast for white candidate and Share of vote Hispanic	p. 6 of Stein Report				
<a href="#">21</a>		Figure 3, The proportion of vote cast for Hispanic candidate and Share of vote White	p. 6 of Stein Report				
<a href="#">22</a>		Figure 4, The proportion of vote cast for Hispanic candidate and Share of vote Hispanic	p. 7 of Stein Report				
<a href="#">23</a>		Table 1 – Citizen Voting Age Population by SBISD Voting District	p. 8 of Stein Report				
<a href="#">24</a>		Demonstrative Spring Branch ISD Single-Member District	p. 8 of Stein Report				
<a href="#">25</a>		Table 2 – Percent Enrollment by Race/Ethnicity	p. 10 of Stein Report				
<a href="#">26</a>		Spring Branch Ecological Inference Report, Descriptive Analyses and Tables, 2015, 2017, 2018, 2019, 2021SBISD Trustee Elections	pp. 2-14 of Stein Supplement to Expert Report				
<a href="#">27</a>		Andres Tijerina Curriculum Vitae					
<a href="#">28</a>		TEA 2022 Accountability Listing - SBISD	<a href="https://rptsrv1.tea.texas.gov/cgi/sas/broker?_service=marykay&amp;_program=perfrept.perfmast.sas&amp;_debug=0&amp;ccyy=2022&amp;lev=D&amp;id=101920&amp;prgopt=reports/acct/ca.sas">https://rptsrv1.tea.texas.gov/cgi/sas/broker?_service=marykay&amp;_program=perfrept.perfmast.sas&amp;_debug=0&amp;ccyy=2022&amp;lev=D&amp;id=101920&amp;prgopt=reports/acct/ca.sas</a>				
<a href="#">29</a>		City of Hunters Creek Demographics	Trustee 6				
<a href="#">30</a>		University of South Carolina University History – Wade Hampton College	Trustee 7				
<a href="#">31</a>	05/01/21	SBISD Trustee Election Canvas Results Report	Trustee 12 SBISD000396				
<a href="#">32</a>		SBISD Board Graphic with Demographic Info	Trustee 13				

<a href="#">33</a>	05/01/21	SBISD Trustee Election Precinct Results Report	Trustee 14 SBISD000398-404				
<a href="#">34</a>		Save SBISD – Trustee Chris Earnest opposes SMD conversion	Trustee 15 Earnest 000962				
<a href="#">35</a>	02/11/21	Text message exchange with C. Earnest announcing Pipeline Committee endorsement	Trustee 17				
<a href="#">36</a>		"Don't HISD MY SBISD At-Large for Every Child" Photo	Trustee 19				
<a href="#">37</a>		Photo with SBISD and HISD Board Members	Trustee 20				
<a href="#">38</a>	07/10/21	C. Earnest tweet with Earnest children and "Don't HISD My SBISD" sign	Trustee 21				
<a href="#">39</a>	04/23/21	Text message exchange between C. Earnest and B.Muecke re Early Voting	Trustee 24 Earnest000104				
<a href="#">40</a>		Pipeline Steering Committee text message re proximity of SBISD building early voting location and childrens' school	Trustee 25 Earnest000803				
<a href="#">41</a>		Pipeline Steering Committee text message re influence	Trustee 26 Earnest000948				
<a href="#">42</a>		CV of Dr. Duncan Klussman					
<a href="#">43</a>		Photo of sign on tree in yard of Spring Branch neighborhood home "Traffic Warning: SLOW CHILDREN If you HISD my SBISD"	p. 38 of Tijerina Report				
<a href="#">44</a>		Table Memorial Villages Anglo Percentage	p. 31 of Tijerina Report				
<a href="#">45</a>		Noel Lezama Resume	Lezama00010				
<a href="#">46</a>	02/01/22	email from N. Marino to N. Lezama re Northbrook softball field vandalism	Lezama00011-14				
<a href="#">47</a>		About Noel Lezama	Lezama00015, 17				
<a href="#">48</a>	11/04/18	screen shot of anonymous election communication	Lezama00020				
<a href="#">49</a>	06/12/18	screen shot of anonymous election communication	Lezama00021				
<a href="#">50</a>	03/17/18	N. Lezama email regarding election activities	Lezama00022				
<a href="#">51</a>		Text message re: "Why I'm voting for David Lopez for Spring Branch ISD School Board"	Lezama00046				
<a href="#">52</a>		David Lopez campaign literature	Lopez000019				
<a href="#">53</a>	4//21/19	D. Lopez email to news@publicmedia.org regarding Spring Branch Election	Lopez000029				
<a href="#">54</a>	07/30/21	D. Tang to D. Lopez email regarding SBISD Single Member Districts	Lopez000031				
<a href="#">55</a>	07/31/21	N. Lezama email re ACTION: Come out to SBISD School Board August 2nd @ 5:00 pm	Lopez000033				
<a href="#">56</a>		David Lopez Vote Early and Election Day Countdown Cards	Lopez001884-1885				

<a href="#">57</a>		David Lopez post-election letter	Lopez001920-1921				
<a href="#">58</a>		David Lopez Opening Statement for Spring Branch Council of PTAs candidates' forum	Lopez001931				
<a href="#">59</a>		David Lopez Talking Points	Lopez001932-1934				
<a href="#">60</a>		David Lopez statement re school rankings and college readiness at SBISD high schools	Lopez 001937				
<a href="#">61</a>		Resume of Dr. Virginia Elizondo					
<a href="#">62</a>		Virginia Elizondo campaign materials	P000001, 2, 3, 6, 7, 9-13, 14-16, 18, 19, 20, 21, 22, 23, 28, 29, 41, 42, 43				
<a href="#">63</a>		Virginia Elizondo post-election materials	P0000039-40				
<a href="#">64</a>	2019-20	2019-20 Texas Academic Performance Report	SBISD000770-797				
<a href="#">65</a>	05/01/21	Early Voting Daily Totals SBISD	SBISD001348				
<a href="#">66</a>	01/13/20	Electoral Systems in Texas 1/13/20 Presentation by Thompson & Horton, LLP to SBISD	SBISD1400-1415				
<a href="#">67</a>	2011-2021	Racial and ethnic composition of teachers, administrative staff and employees of SBISD campuses 2011-2021	SBISD001416-1688				
<a href="#">68</a>	2011-2021	Racial and ethnic composition of SBISD employees who are neither teachers nor administrator 2011-2021	SBISD001689-1699				
<a href="#">69</a>	2011-2021	Racial and ethnic composition of SBISD employees working at Wayne F. Schaper, Sr. Leadership Center (Administration Bldg) 2011-2021	SBISD001700-1705				
<a href="#">70</a>	2011-2021	Racial and ethnic composition of district-wide administrative staff 2011- 2021	SBISD1706-1711				
<a href="#">71</a>	2011-2021	Racial and ethnic composition of certified peace officers in SBISD police department 2011-2021	SBISD001712-1715				
<a href="#">72</a>	1988-2021	Votes Cast in Each Election 1988 – 2021	SBISD001732-1852				
<a href="#">73</a>	2020-2021	2020-21 Texas Academic Performance Report (TAPR)	SBISD001853-1880				
<a href="#">74</a>		Text message regarding PIPEline candidate endorsement	SBISD007065-7066				
<a href="#">75</a>		Text message regarding PIPEline political action committee and endorsements	SBISD007077-7079				
<a href="#">76</a>	02/01/22	email and photos re vandalism of Northbrook softball field	SBISD0007154-7162				
<a href="#">77</a>	10/04/21	email from Somos Spring Branch re Somos Spring Branch: Requests	SBISD006298-6301				
<a href="#">78</a>	08/13/2021 - 09/02/21	email exchange with SBISD regarding early voting locations	SBISD005822-5826				
<a href="#">79</a>		TEA 2019 SBISD Accountability Rating Table	P000700-701				

<a href="#">80</a>		Pipeline text re role of early voting	Earnest000748-749				
<a href="#">81</a>	04/28/21	text message re "How did a pair of Aggies become Communists???"	Goodson000001				
<a href="#">82</a>		Comparing the Candidates – Position 4 Who's most prepared & committed to SBISD	Goodson000038				
<a href="#">83</a>		1026 Districts, Vastly Different Demographics	P000702-705				
<a href="#">84</a>		2022 Accountability System Overview	P000706				
<a href="#">85</a>		Noel Lezama Letter - Diversity, History, Success	P000707-710				
<a href="#">86</a>		Demographics - October 2022	P000711				
<a href="#">87</a>		SBISD 2022 General and Special Election Results	SBISD007556-007577				
<a href="#">88</a>		SBISD 2023 General and Special Election Results	SBISD007937-7939				
<a href="#">89</a>		2022 Statewide Accountability Ratings	P000712				
<a href="#">90</a>		Resume of Ricardo Barnes					
<a href="#">91</a>							
<a href="#">92</a>							
<a href="#">93</a>							
<a href="#">94</a>							
<a href="#">95</a>							
<a href="#">96</a>							
<a href="#">97</a>							
<a href="#">98</a>							
<a href="#">99</a>							
<a href="#">100</a>							
<a href="#">101</a>							
<a href="#">102</a>		Spring Branch ISD					
<a href="#">103</a>		SBISD Diversity	SBISD 2				

<u>104</u>		SBISD Election Precincts	SBISD 5 SBISD000001				
<u>105</u>		Racial/Ethnic Percentages by Middle School Enrollment Zones	PX1, p.10				
<u>106</u>		Memorial Villages Anglo Percentages	PX44				
<u>107</u>		Percentage of Economically Disadvantaged Students	PX13				
<u>108</u>		2022 TEA Accountability Ratings - Student Achievement	PX28				
<u>109</u>							
<u>110</u>		Early Voting Locations Pre-May 22nd 2022 Election	PX12				
<u>111</u>							
<u>112</u>		Pattern of Disparate Disciplinary Practices based on Ethnicity/Race	PX14				
<u>113</u>		Race/Ethnicity of SBISD Staff 2021 (by Middle School Campus)	PX67				
<u>114</u>		Race/Ethnicity of SBISD Staff 2021 (District-Wide)	PX70				
<u>115</u>		Race/Ethnicity of SBISD Police Dept 2021	PX71				
<u>116</u>							
<u>117</u>		Chris Earnest Obtained Majority of Total Vote from 3 Precincts - Memorial, Spring Branch, Spring Forest - Early Voting Larger than Election Day Voting	PX31				
<u>118</u>		Lisa Alpe Obtained Majority of Total Vote from 3 Precincts - Memorial, Spring Branch, Spring Forest - Early Voting Larger than Election Day Voting	PX87				
<u>119</u>		John Perez Obtained Majority of Total Vote from 3 Precincts - Memorial, Spring Branch, Spring Forest - Early Voting Larger than Election Day Voting	PX87				
<u>120</u>		Courtney Anderson Obtained Majority of Total Vote from 3 Precincts - Memorial, Spring Branch, Spring Forest - Early Voting Larger than Election Day Voting	PX88				
<u>121</u>							
<u>122</u>		2015 - Comparison of White Voter and Hispanic Voter Preferences (Elizondo vs Vierra)	PX2				
<u>123</u>		2015 - Comparison of White Voter and Hispanic Voter Preferences (Adams vs Dawson)	PX2				
<u>124</u>		2017 - Comparison of White Voter and Hispanic Voter Preferences (Gonzales vs Mettenbrink)	PX2				
<u>125</u>		2018 - Comparison of White Voter and Hispanic Voter Preferences (Caesar vs Lezama)	PX2				
<u>126</u>		2019 - Comparison of White Voter and Hispanic Voter Preferences (Breed vs Lopez)	PX2				

<u>127</u>		2021 - Comparison of White Voter and Hispanic Voter Preferences (Elizondo vs Earnest)	PX2				
<u>128</u>		2022 - Comparison of White Voter and Hispanic Voter Preferences (Alpe vs Breed)	PX3				
<u>129</u>		2022 - Comparison of White Voter and Hispanic Voter Preferences (Perez vs Kaczinski vs Mafrige)	PX3				
<u>130</u>		2022 - Comparison of White Voter and Hispanic Voter Preferences (Bennett vs Slattery vs Morace)	PX3				
<u>131</u>		2023 - Comparison of White Voter and Hispanic Voter Preferences (Lopez vs Anderson)	PX4				
<u>132</u>		2023 - Comparison of White Voter and Hispanic Voter Preferences (Downs vs Mahan)	PX4				
<u>133</u>		2023 - Comparison of White Voter and Hispanic Voter Preferences (Lopez vs Anderson)	DX8				
<u>134</u>		2023 - Comparison of White Voter and Hispanic Voter Preferences (Mahan vs Downs)	DX8				
<u>135</u>		Comparison of White Voter and Hispanic Voter Preferences	PX2-PX4				
<u>136</u>		Supplement to Expert Report Re: 2024 SBISD Trustee Elections of Robert M. Stein, Ph.D., June 28, 2024					
<u>137</u>		2015-2024 Table of SBISD Trustee Elections and Hispanic-Preferred Candidate Results					
<u>138</u>		ABA Commission on Hispanic Legal Rights and Responsibilities, "Latinos in the United States: Overcoming Legal Obstacles, Engaging in Civic Life" (2024)					
<u>139</u>		SBISD School and SKY Partnership Program Closures					
<u>140</u>							
<u>141</u>							
<u>142</u>							
<u>143</u>							
<u>144</u>							
<u>145</u>							
<u>146</u>							
<u>147</u>							
<u>148</u>							
<u>149</u>							

150							
151							
152							
153							
154							

Respectfully submitted,

/s/ Barry Abrams

Barry Abrams  
State Bar No. 00822700  
SD Tex. Bar No. 2138  
Robert Scott  
State Bar No. 17911800  
SD Tex. Bar No. 3085  
Domingo Llagostera  
State Bar No. 24070157  
SD Tex. Bar No. 1120040  
BLANK ROME LLP  
717 Texas Avenue, Suite 1400  
Houston, Texas 77002  
(713) 228-6606  
(713) 228-6605 (fax)  
[barry.abrams@blankrome.com](mailto:barry.abrams@blankrome.com)  
[bob.scott@blankrome.com](mailto:bob.scott@blankrome.com)  
[domingo.llagostera@blankrome.com](mailto:domingo.llagostera@blankrome.com)

Martin Golando  
State Bar No. 24059153  
Admitted Pro Hac Vice  
THE LAW OFFICE OF MARTIN  
GOLANDO, PLLC  
2326 W. Magnolia  
San Antonio, Texas 78201  
(210) 471-1185  
(210) 405-6772 (fax)  
[martin.golando@gmail.com](mailto:martin.golando@gmail.com)

**CERTIFICATE OF SERVICE**

I certify that the foregoing document was served on all parties of record via the Court’s electronic filing system on September 5, 2024.



\_\_\_\_\_  
Barry Abrams